

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION**

**COURTHOUSE NEWS SERVICE,**

*Plaintiff,*

**V.**

**JOANNA STATON, in her official capacity as Bell County District Clerk; GLORIA A. MARTINEZ, in her official capacity as Bexar County District Clerk; GABRIEL GARCIA, in his official capacity as Brazos County District Clerk; CASIE WALKER, in her official capacity as Burnet County District Clerk; MICHAEL GOULD, in his official capacity as Denton County District Clerk; CLARISSA WEBSTER, in her official capacity as Ector County District Clerk; MELANIE REED, in her official capacity as Ellis County District Clerk; NORMA FAVELA BARCELEAU, in her official capacity as El Paso County District Clerk; JOHN D. KINARD, in his official capacity as Galveston County District Clerk; LAURA HINOJOSA, in her official capacity as Hidalgo County District Clerk; JAMIE SMITH, in his official capacity as Jefferson County District Clerk; DAVID LLOYD, in his official capacity as Johnson County District Clerk; JON GIMBLE, in his official capacity as McLennan County District Clerk; ALEX ARCHULETA, in his official capacity as Midland County District Clerk; MELISA MILLER, in her official capacity as Montgomery County District Clerk; LORETTA CAMMACK, in her official capacity as Montgomery County District Clerk; ANNE LORENTZEN, in her official capacity as Nueces County District Clerk;**

**CIVIL ACTION NO.**

**4:24-cv-00368-SDJ**

STEPHANIE MENKE, *in her official* §  
*capacity as Potter County District Clerk;* §  
TAMMY ROBINSON, *in her official* §  
*capacity as Taylor County District Clerk;* §  
and MEGAN LAVOIE, *in her official* §  
*capacity as Director for the Texas Office* §  
*of Court Administration,* §  
§  
*Defendants.* §

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**DEFENDANT DAVID LLOYD’S UNOPPOSED MOTION FOR EXTENSION OF  
TIME TO ANSWER OR OTHERWISE RESPOND TO PLAINTIFF COURTHOUSE  
NEWS SERVICE’S AMENDED FIRST AMENDED COMPLAINT**

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TO THE HONORABLE JUDGE OF THE COURT:

COMES NOW Defendant DAVID LLOYD, in his official capacity as Johnson County District Clerk (“Lloyd”), pursuant to the provisions of Fed. R. Civ. P. 6(b), and files his Unopposed<sup>1</sup> Motion for Extension of Time to Answer or Otherwise Respond to Plaintiff Courthouse News Service’s Amended First Amended Complaint. In support of this motion, Lloyd respectfully shows the Court:

1. On July 9, 2024, Plaintiff Courthouse News Services (“CNS”) filed Plaintiff’s Amended First Amended Complaint for Preliminary and Permanent Injunctive and Declaratory Relief. (See Document 11, currently on file with the Court). A summons was requested and issued on the same date. As Lloyd was served on July 11, 2024, the deadline for Lloyd to answer or otherwise respond to the Amended Complaint would be August 1, 2024.

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<sup>1</sup> Plaintiff Courthouse News Service does not oppose the thirty (30) day extension sought in this motion.

2. Good cause exists for the granting of this motion. The undersigned counsel was just recently retained in this case and has not had an opportunity to fully review the file and properly respond to the allegations. Lloyd seeks a thirty (30) day extension of time, until August 31, 2024, to file a responsive pleading, and all other defenses, to CNS's Amended Complaint. Counsel for the Plaintiff CNS has indicated he does not oppose this request. Therefore, there would be no prejudice to the Plaintiff should the Court grant this request.

WHEREFORE PREMISES CONSIDERED, Defendant DAVID LLOYD, in his official capacity as Johnson County District Clerk, prays the Court would grant this unopposed Motion for Extension of Time to Answer or Otherwise Respond to Plaintiff Courtroom News Service's Amended Complaint, extend the deadline to answer or otherwise respond to the complaint to August 31, 2024, and grant Defendant such other and further relief the Court deems just and proper.

Respectfully submitted,

By: 

GRANT D. BLAIES  
State Bar No. 00783669  
E-mail: [grantblaies@bhilaw.com](mailto:grantblaies@bhilaw.com)

**BLAIES & HIGHTOWER, L.L.P.**  
100 Throckmorton Street, Suite 1400  
Fort Worth, Texas 76102  
817-334-0800 (Telephone)  
817-334-0574 (Facsimile)

ATTORNEYS FOR DEFENDANT DAVID  
LLOYD, IN HIS OFFICIAL CAPACITY  
AS JOHNSON COUNTY DISTRICT  
CLERK.

**CERTIFICATE OF CONFERENCE**

I hereby certify that on July 29, 2024, I conferred with Matt Dow, counsel for Plaintiff Courtroom news Services. Mr. Dow stated he is unopposed to the thirty (30) day extension sought in this motion.




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Grant D. Blaies

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of this instrument has been served upon the below-listed counsel of record via the Court's CM/ECF system, on this the 31<sup>st</sup> day of July, 2024:

John K. Edwards JACKSON WALKER, LLP – Houston 1401 McKinney, Suite 1900 Houston, Texas 77010 <a href="mailto:jedwards@jw.com">jedwards@jw.com</a>	<input type="checkbox"/> FACSIMILE <input type="checkbox"/> U.S. FIRST CLASS MAIL <input type="checkbox"/> CERTIFIED MAIL, RRR <input type="checkbox"/> HAND DELIVERY <input checked="" type="checkbox"/> ELECTRONIC TRANSMISSION
James M. Dow JACKSON WALKER, LLP – Austin 100 Congress Avenue, Suite 1100 Austin, Texas 78701 <a href="mailto:mdow@jw.com">mdow@jw.com</a>	<input type="checkbox"/> FACSIMILE <input type="checkbox"/> U.S. FIRST CLASS MAIL <input type="checkbox"/> CERTIFIED MAIL, RRR <input type="checkbox"/> HAND DELIVERY <input checked="" type="checkbox"/> ELECTRONIC TRANSMISSION
Robert J. Davis MATTHEWS SHIELDS KNOTT EDEN DAVIS & BEANLAND, LLP – DALLAS <a href="mailto:bdavis@mssattorneys.com">bdavis@mssattorneys.com</a>	<input type="checkbox"/> FACSIMILE <input type="checkbox"/> U.S. FIRST CLASS MAIL <input type="checkbox"/> CERTIFIED MAIL, RRR <input type="checkbox"/> HAND DELIVERY <input checked="" type="checkbox"/> ELECTRONIC TRANSMISSION

Matthew J. Shovlin DENTON COUNTY CRIMINAL DISTRICT ATTORNEY'S OFFICE 1450 East McKinney, Suite 3100 Denton, Texas 76209 <a href="mailto:Matt.shovlin@dentoncounty.com">Matt.shovlin@dentoncounty.com</a>	<input type="checkbox"/> FACSIMILE <input type="checkbox"/> U.S. FIRST CLASS MAIL <input type="checkbox"/> CERTIFIED MAIL, RRR <input type="checkbox"/> HAND DELIVERY <input checked="" type="checkbox"/> ELECTRONIC TRANSMISSION
Nicole Reustle NUECES COUNTY 901 Leopard Street, Suite 207 Corpus Christi, Texas 78401 <a href="mailto:Nicole.reustle@nuecescountytexas.gov">Nicole.reustle@nuecescountytexas.gov</a>	<input type="checkbox"/> FACSIMILE <input type="checkbox"/> U.S. FIRST CLASS MAIL <input type="checkbox"/> CERTIFIED MAIL, RRR <input type="checkbox"/> HAND DELIVERY <input checked="" type="checkbox"/> ELECTRONIC TRANSMISSION
Jennifer P. Dorsey NUECES COUNTY DISTRICT ATTORNEY 901 Leopard Street, Room 207 Corpus Christi, Texas 78401 <a href="mailto:Jenny.dorsey@nuecescountytexas.com">Jenny.dorsey@nuecescountytexas.com</a>	<input type="checkbox"/> FACSIMILE <input type="checkbox"/> U.S. FIRST CLASS MAIL <input type="checkbox"/> CERTIFIED MAIL, RRR <input type="checkbox"/> HAND DELIVERY <input checked="" type="checkbox"/> ELECTRONIC TRANSMISSION




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